



MAY 14 2014

Ben Kovic
Chairperson
Nunavut Wildlife Management Board
Box 1379
Iqaluit, NU X0A 0H0

Re: Public hearing of the Nunavut Wildlife Management Board concerning the regional total allowable harvest from the M'Clintock Channel polar bear subpopulation

Dear Mr. Kovic:

Thank you for the opportunity to provide input into the public hearing regarding the establishment of a Total Allowable Harvest (TAH) for the M'Clintock Channel polar bear subpopulation by Inuit of Nunavut. Environment Canada recognizes the unique role that Wildlife Management Boards play in integrating our agency's perspective with that of others stakeholders at this stage of the process. Environment Canada welcomes the openness and thoroughness of the decision-making process for establishing polar bear harvest levels in Canada.

I understand that the Kitikmeot Regional Wildlife Board (KRWB) has submitted a request to the Nunavut Wildlife Management Board to increase the TAH for the M'Clintock Channel polar bear subpopulation from three to 18 bears. In order to provide input on this matter, I would like to summarize what is known about this particular subpopulation of polar bears.

Following a six-year mark-recapture study conducted in the 1970's the population estimate for M'Clintock Channel was 900 bears. Given that hunters believed that this estimate was too high, the Polar Bear Technical Committee decreased the estimate to 700 bears. A subsequent study was completed in 2001 and estimated the population to be 240 bears, after which a harvest moratorium was put in place and there was a commitment to establish a Recovery Plan. The 2001 population estimate was adjusted to 284 (± 59.3) in 2002 following additional analyses, and while survival and recruitment rates were lower than previous standardized estimates, the population was determined to be stable ($\lambda = 1.03$). In the 2005 Polar Bear Memorandum of Understanding (MoU) between Cambridge Bay (Ekaluktutiak Hunters' and Trappers' Organization), Gjoa Haven (Gjoa Haven Hunters' and Trappers' Organization), Taloyoak (Spence Bay Hunters' and Trappers' Organization), the Kitikmeot Hunters' and Trappers' Organization and The Department of Environment, Government of Nunavut it is stated that the target population size for M'Clintock Channel is 750 bears, and in that same Objective (2.3) it is noted that a goal is to ensure that the M'Clintock Channel subpopulation remains abundant and productive. To reach a target population size of 750 bears, harvest levels must necessarily be below the maximum sustainable harvest. It is in this same MoU that a TAH of three bears was formalized. As the KRWB mention in their letter, this TAH has remained in effect until the present day.

According to the most recent (2013) PBTC status table, the M'Clintock Channel subpopulation has a recent trend of "likely increase" on account of the quota being below the maximum sustainable yield and a quantitative assessment of growth rate. In 2009, hunters from the region commented that an increasing number of bears were being observed in the subpopulation. However, the most recent Aboriginal



Traditional Knowledge assessment (in the 2013 PBTC status table) has classified the subpopulation as 'stable' at 284 bears.

The generally accepted practice is that when a polar bear subpopulation is healthy, the sustainable harvest can be up to a maximum of 4.5%, if criteria such as population stability and a sex ratio in the harvest of about 2 males:1 female are met. For M'Clintock Channel, using the "4.5% rule" may permit a harvest of as many as 13 bears per year. However, given the lack of up-to-date population information there is uncertainty in meeting the biological criteria implicit in the "4.5% rule". As such, it is recommended that the precautionary principle be applied and that the TAH does not reach this maximum. Indeed, Canadian jurisdictions frequently set harvest quotas below this level to ensure that harvests remain sustainable.

Moreover, providing a clear rationale for any decision on harvest level will be particularly important in a context of heightened national and international scrutiny. It is also important to note that the Government of Nunavut is commencing a new study that will update the population estimate for M'Clintock Channel within two or three years. These data will provide an important piece of information – namely whether the population has indeed increased on account of the restrictive harvest levels that have been in place for the past 13 years. Until we have those data in-hand, we cannot be certain of the population size for M'Clintock Channel.

That all said, while Environment Canada recognizes the importance of a subsistence harvest to Inuit of the Canadian North, an increase in TAH to 18 bears would almost certainly contribute to a population decline in M'Clintock Channel. Indeed, it would be most prudent to maintain the current TAH of three bears until a new population estimate has been obtained. However, I recognize that an argument could be made for increasing the TAH beyond three bears, but less than 13 bears, in order to continue to move towards the agreed-upon target population size as stated in the MoU. In the event of any change to TAH at the current time, it's going to be vital that the harvest level be re-considered once again when the ongoing survey has been completed and we have a new population estimate for the M'Clintock Channel subpopulation.

As you are aware, Canada's management of polar bear continues to be under intense international scrutiny, and I cannot over-emphasize the importance of ensuring that harvest levels are sustainable and follow sound conservation principles. Ensuring that we are able to continue to demonstrate that our levels of harvest and trade are sustainable, according to international standards, will enable us to maintain trade from M'Clintock Channel as well as from other management units across the range of polar bears in Canada.

Best wishes,


for Sue Milburn-Hopwood
Director General
Canadian Wildlife Service